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June 28, 2024

The Honorable Christopher J. Burke  
United States District Court  
for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Room 2325, Unit 28  
Wilmington, DE 19801-3555

*VIA ELECTRONIC FILING*

Re: *CosmoKey Solutions GmBH & Co. v. Duo Security, Inc. n/k/a Duo  
Security LLC and Cisco Systems, Inc.,  
C.A. No. 18-1477 (JLH) (CJB)*

Dear Judge Burke:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer via video teleconference via Zoom on the following date(s): June 20, 2024. The parties also had subsequent written communications following the meet and confer.

Delaware Counsel for Plaintiff: Andrew Brown

Lead Counsel for Plaintiff: Matthew Wisnieff, Lauren Pelletier

Delaware Counsel for Defendants: Jennifer Ying

Lead Counsel for Defendants: Allen Kathir

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The dispute requiring judicial attention is listed below:

- Defendants' request for Plaintiff to supplement its infringement contentions, including to specifically describe the software elements Plaintiff contends satisfy the claimed "authentication function" limitation in the Accused Products and identify the specific line(s) of source code identifying any such software elements.
- Plaintiff's request for Defendant to complete its technical document production and comply with the Court's Sept. 28, 2023 (D.I. 114) order, including production of Cisco source code for the accused Infringing Cisco Products, all differential emails in an easily accessible manner, and all Slack Channels either relating to the accused offerings or cited within Defendants' source code.
- Plaintiff's request that Defendants withdraw the three new prior art references identified in Appendices A11-A13 first asserted in their June 7, 2024 supplemental invalidity contentions.

Counsel is available should the Court have any questions.

Respectfully,

*/s/ Jennifer Ying*

Jennifer Ying (#5550)

JY/lo

cc: Clerk of the Court (via hand delivery)  
All Counsel of Record (via CM/ECF and e-mail)